

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JEROME K. HAMILTON, a/k/a  
ELOHIM CHEIKH AHMED,

Plaintiff,

v.

CATHY L. GUESSFORD, REBECCA  
MCBRIDE, ROBERT F. SNYDER, THOMAS  
L. CARROLL, and STANLEY W. TAYLOR,  
JR.

Defendants

C.A. No. 04-1422 (GMS)

JURY TRIAL DEMANDED

**NOTICE OF DEPOSITION DUCES TECUM\***

TO: Eileen Kelly, Esquire  
Department of Justice  
820 N. French Street, 6th Floor  
Wilmington, DE 19801

PLEASE TAKE NOTICE, that the undersigned will take the oral deposition of Rebecca McBride, on April 13, 2007 at 10:00 a.m. in the offices of Aber, Goldlust, Baker & Over, 702 King Street, Suite 600, Wilmington, DE 19801.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber

GARY W. ABER (DSB #754)  
702 King Street, Suite 600  
P.O. Box 1675  
Wilmington, DE 19899  
302-472-4900  
Attorney for Plaintiff

DATED: March 26, 2007

**\*The deponent is to bring with her all documents reflected in the attached Exhibit No. 1**

**EXHIBIT NO. 1**

1. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1991.

2. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1992.

3. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1993.

4. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1994.

5. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1995.

6. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1996.

7. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1997.

8. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1998.

9. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 1999.

10. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 2000.

11. All documents relating to or pertaining to the calculation of the sentence of the plaintiff, Jerome Hamilton, a/k/a Elohim Cheikh Ahmed in 2001.

12. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1991.

13. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1992.

14. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1993.

15. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1994.

16. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1995.

17. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1996.

18. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1997.

19. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1998.

20. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 1999.

21. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 2000.

22. All communications between the defendant Cathy L. Guessford and any other person concerning the calculation of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed for the year 2001.

23. All documentation concerning the calculation of the sentence of the plaintiff Jerome Hamilton, a/k/a Elohim Cheikh Ahmed during the litigation of .

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the attached pleading was filed via electronic filing on March 26, 2007 and was served on the following counsel:

Eileen Kelly, Esquire  
Department of Justice  
820 N. French Street, 6th Floor  
Wilmington, DE 19801

/s/ Melissa A. Chionchio  
Melissa A. Chionchio  
Secretary to Gary W. Aber, Esquire